

HUSCH BLACKWELL

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August 14, 2017

Via US Mail & Electronic Mail

Thomas Martin
Associate Regional Counsel
Office of Regional Counsel (C-13J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Stephanie Linebaugh
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd. (SR-6J)
Chicago, Illinois 60604-3590

Re: Solutia Inc. and Pharmacia LLC's Preliminary Response to EPA Special Notice
Letter for the Sauget Area 2 sites, Operable Unit 1, Sauget and Cahokia, Saint
Clair County, Illinois

Dear Tom and Stephanie,

In response to the U.S. Environmental Protection Agency ("EPA") Special Notice Letter ("SNL") dated August 1, 2017, this letter confirms that Solutia Inc. and Pharmacia LLC (f/k/a Pharmacia Corporation) (collectively, "S/P") are willing to participate in future negotiations with EPA concerning Operable Unit 1 (OU1) of the Sauget Area 2 sites in Sauget and Cahokia, St. Clair County, Illinois. Further, I note that American Zinc Company/Blue Tee Corp., BFI Waste Systems of North America, LLC (and affiliated entities Browning Ferris Industries, LLC and Allied Waste North America, LLC), Cerro Flow Products LLC (i.e., Cerro Copper), Chemical Waste Management, Inc., Cyprus Amax Minerals Company, General Mills, Inc. and Pillsbury Company, LLC, Illinois Central Railroad Company (f/k/a Gulf, Mobile & Ohio Railroad Company), Mallinckrodt LLC, Monsanto Company, Rogers Cartage Co., Sequa Corporation, Service America Corporation (and affiliate Volume Services America, Inc.), and Tronox LLC (f/k/a Kerr-McGee) are included on the List of Potential Responsible Parties attached to the

HUSCH BLACKWELL

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August 14, 2017
Page 2

SNL. Please be advised that S/P has settled with and/or will represent the interests of these entities in these negotiations with respect to OU1 of the Sauget Area 2 sites and, as we've discussed and as agreed to with respect to Area 1, expects the entities we have settled with to be included as "Non-Performing Settling Parties" on a Consent Decree for purposes of obtaining covenants not to sue and contribution protection.

For the sake of clarity, I'll address the deadline for submission of a "good faith offer" and termination of the negotiation moratorium. Under CERCLA section 122(e)(2)(B), my clients have 60 days from the date of receipt of the SNL to make a proposal. The earliest Solutia received the SNL was August 3, 2017, and, accordingly, the deadline for S/P to provide EPA with a "good faith offer" is no earlier than October 2, 2017. Further, assuming a proposal is submitted by October 2, the 120-day negotiation moratorium would expire no earlier than Wednesday, December 1, 2017. Please let me know if you disagree with these dates.

Otherwise, we have been engaged in discussions with Exxon Mobil, Afton Chemical/Ethyl, BASF Corp./Inmont, Glidden (U.S. Paint), T.H. Agriculture and Nutrition, LLC, and Ameren (Union Electric) and hope these negotiations will lead to a proposal. Please include Cathy Bumb and Steve Smith of Solutia Inc. at 575 Maryville Center Drive, St. Louis, MO 63141, on any future correspondence.

I look forward to our upcoming discussions.

Sincerely,



Jason A. Flower

cc: Michael Zoeller, U.S. DOJ (via e-mail)
Cathy Bumb (via e-mail)
Steve Smith (via e-mail)
Counsel for settling parties (via e-mail)